

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN DOE 1 and JANE DOE 1, in their
own Capacity and as parents of CHILD
DOE 1, JOHN DOE 2 and JANE DOE 2,
in their own Capacity as parents of CHILD
DOE 2, JANE DOE 3, in her own capacity
and as parent of CHILD DOE 3 on on
behalf of simiarly situated,

Plaintiffs

v.

PERKIOMEN VALLEY SCHOOL
DISTRICT, a Pennsylvania governmental
entity, JASON SAYLOR, MATTHEW
DORR, ROWAN KEENAN, DON
FOUNTAIN, KIM MARES, REENA
KOLAR, SARAH EVANS-BROCKETT,
LAURA WHITE and TAMMY CAMPLI,
all Individual elected offices sued in their
official capacity as members of the
BOARD OF SCHOOL DIRECTORS OF
THE PERKIOMEN VALLEY SCHOOL
DISTRICT, a Pennsylvania elected
legislative body,

Defendants.

CIVIL ACTION NO. 2:22-cv-00287

**DEFENDANTS' MOTION TO DISSOLVE THE PRELIMINARY INJUNCTION
OR IN THE ALTERNATIVE STAY IMPLEMENTATION OF THE
PRELIMINARY INJUNCTION**

Defendants the Perkiomen Valley School District ("District"), Jason Saylor, Matthew Dorr, Rowan Keenan, Don Fountain, Kim Mares, Reena Kolar, Sarah Evans-Brockett, Laura White, and Tammy Campli, by and through their attorneys Fox Rothschild LLP, respectfully move before this Court to dissolve the preliminary injunction dissolve its February 7, 2022 Order (ECF No. 39), granting Plaintiffs' Motion for a Preliminary Injunction enjoining the District from implementing or enforcing Phase Two of the ARP ESSER Health and Safety Transition Plan,

approved by the Board on January 2, 2022, entitled “Masking – beginning January 24, 2022” or in the alternative, grant Defendants an immediate stay of the February 7, 2022 Order.

Given the impact of the February 7, 2022 Order on the students, families, and staff of the District, Defendants respectfully request that this Motion be considered on an **expedited basis**.

In support of its Motion, Defendants rely upon the contemporaneously filed Brief in Support of Defendants’ Motion to Dissolve the Preliminary Injunction or in the Alternative Stay Implementation of the Preliminary Injunction.

Respectfully submitted,

FOX ROTHSCHILD LLP

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